

EXHIBIT D

Subject to and without waiving the forgoing objections, Defendants provide the factual basis for a judicial immunity defense as follows: Chief Judge Gregory was acting in his official judicial capacity when he made the decisions to deny, in part, Plaintiff's motion for a continuance and defer ruling on her motion for disqualification.

Interrogatory No. 4: Identify all persons whom Defendants intend to call as witnesses at trial, including any expert(s), and give a summary of their anticipated testimony. Please organize your response by Defendant.

Objections and Response to Interrogatory No. 4:

Defendants object to this interrogatory to the extent that it requests information subject to any privilege or restriction on the release of information, including the attorney-client privilege, the attorney work product doctrine, and the deliberative process privilege.

Defendants further object to this interrogatory as premature, particularly in that discovery is ongoing in this case, and it is thus too soon for any determinations about witnesses to be called at trial or whether supplementation of Defendants' initial disclosures will be appropriate.

Defendants further object to this interrogatory to the extent it seeks disclosure of information beyond that required by the Federal Rules of Civil Procedure and Federal Rules of Evidence, including summaries of expected testimony at trial.

Subject to and without waiving the foregoing objections, Defendants will disclose information required by the Federal Rules of Civil Procedure, the Federal Rules of Evidence, and the applicable local rules in the time frames provided by those rules and any applicable court orders.

Interrogatory No. 5: Identify all persons from whom Defendants have received statements (oral or written) relating to the allegations set forth in the civil complaint, including any related denials

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
CASE NUMBER 1:20CV66**

CARYN DEVINS STRICKLAND,)	
)	
Plaintiff,)	
)	
v.)	
)	
UNITED STATES OF AMERICA, et al.,)	
)	
Defendants.)	

**DEFENDANTS' OBJECTIONS AND RESPONSES TO PLAINTIFF'S
THIRD SET OF INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendants, by and through undersigned counsel, hereby provide the following supplemental response to Plaintiff's Interrogatory No. 1. Defendants hereby incorporate all objections and responses lodged in its Objections and Responses to Plaintiff's Third Set of Interrogatories, served on December 21, 2022. Defendants do not waive such objections by service of this supplemental response.

Interrogatory No. 1: Identify all persons with knowledge or information relating to the allegations in the civil complaint, including any related denials or defenses asserted in any answer to the civil complaint.

Objections and Response to Interrogatory No. 1:

Defendants object to this interrogatory to the extent that it requests information subject to any privilege or restriction on the release of information, including the attorney-client privilege, the attorney work product doctrine, and the deliberative process privilege.

Defendants further object to this interrogatory as overly burdensome and disproportionate to the needs of the case. The complaint in this case consists of 505 paragraphs of allegations, many of which are not pertinent to Plaintiff's claims. To answer this interrogatory would require Defendants to identify persons with knowledge regarding any of those 505 paragraphs. Defendants further object to the extent this interrogatory purports to require Defendants to identify every person with knowledge or information, now matter how minor or immaterial, relating to the allegations in the complaint.

Subject to and without waiving the foregoing objections, the following persons have material knowledge or information relating to the allegations of sexual harassment, discrimination, and/or retaliation in the civil complaint:

- Anthony ("Tony") Martinez
Former Federal Defender
Federal Public Defender, Western District of North Carolina
- John Parke ("JP") Davis
Assistant Federal Defender
Federal Public Defender, Western District of North Carolina
- Peter Adolf
Assistant Federal Defender
Federal Public Defender, Western District of North Carolina
- Joshua B. Carpenter
Appellate Chief
Federal Public Defender, Western District of North Carolina
- William ("Bill") Moorman
Administrative Officer
Federal Public Defender, Western District of North Carolina
- Heather Beam
Human Resources Manager
United States District Court & Probation
Western District of North Carolina
- Edward ("Ed") Smith

Chief Circuit Mediator
U.S. Court of Appeals for the Fourth Circuit

- James Ishida
Circuit Executive
U.S. Court of Appeals for the Fourth Circuit
- The Honorable Roger L. Gregory
Chief Judge
U.S. Court of Appeals for the Fourth Circuit
- Jill Langley
Director of Workplace Relations
U.S. Courts of Appeals for the Eighth and Tenth Circuits
- Nancy Dunham
Former Fair Employment Practices Officer
Administrative Office of the U.S. Courts
- Lee Ann Bennett
Deputy Director
Administrative Office of the U.S. Courts
- Shirley Sohrn
Former Assistant General Counsel
Administrative Office of the U.S. Courts
- William Meyers
General Counsel
Administrative Office of the U.S. Courts
- Cait Clarke
Former Chief, Defender Services Office
Administrative Office of the U.S. Courts
- Sheryl Walter
Former General Counsel
Administrative Office of the U.S. Courts
- Amaal Scroggins
Attorney Advisor, Office of Fair Employment Practices
Administrative Office of the U.S. Courts
- Brittley Odom
Former Acting Chief, Staffing Services Branch
Court Human Resources Division

Administrative Office of the U.S. Courts

- Valerie Farr
HR Specialist
Staffing Services Branch
Administrative Office of the U.S. Courts
- Laura Minor
Former Associate Director of the Department of Program Services
Administrative Office of the U.S. Courts
- Kim Llewellyn
Assistant Circuit Executive for Human Resources
U.S. Court of Appeals for the Fourth Circuit
- Erin Taylor
Assistant Federal Defender
Federal Public Defender, Western District of North Carolina

Defendants have compiled this list after reasonable inquiry with witnesses identified in Plaintiff's Complaint, but reserve the right to supplement this response with additional information learned in the course of discovery.

Dated: April 17, 2023

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

CARLOTTA P. WELLS
Assistant Branch Director

/s/ Joshua Kolsky
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FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
CASE NUMBER 1:20CV66

CARYN DEVINS STRICKLAND,)	
)	
Plaintiff,)	
)	
v.)	
)	
UNITED STATES OF AMERICA, et al.,)	
)	
<u>Defendants.</u>)	

VERIFICATION OF INTERROGATORY 1

Based on information that I obtained in the course of my official duties, I declare under penalty of perjury that the response to Interrogatory 1 is true and correct to the best of my knowledge and belief.

Dated: April 17, 2023

SIGNED: Colleen M. Papson

Colleen Papson
Paralegal Specialist
Office of the General Counsel
Administrative Office for the U.S. Courts